

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND
DEVELOPMENT,**
Plaintiff,

v.

CANON INC.,
Defendant.

**CIVIL ACTION 6:20-cv-00980-ADA
CIVIL ACTION 6:20-cv-00981-ADA
CIVIL ACTION 6:20-cv-00982-ADA**

CANON INC.,
Third-Party Plaintiff,

v.

NXP USA, INC.,
Third-Party Defendant.

CIVIL ACTION 6:20-cv-00980-ADA

**JOINT STIPULATION CONCERNING PRE-MARKMAN DEADLINES AND
CONSOLIDATED MARKMAN BRIEFING**

TO THE HONORABLE COURT:

Plaintiff WSOU Investments, LLC (“WSOU”) and Defendant Canon Inc. (“Canon”) (collectively, the “Parties”) submit this Joint Stipulation to memorialize their agreement to adjust the Scheduling Order and agreement on consolidated *Markman* briefing. The Parties have agreed to adjust the Scheduling Order to afford the Parties more time to prepare for *Markman*, and to better align the case schedule with the Court’s OGP. Importantly, the adjusted dates do not affect dates that would affect the Court (i.e., the *Markman* hearing date). The Parties have jointly agreed to modify the schedule as follows:

Defendant's Opening Claim Construction brief: August 23, 2021

Plaintiff's Response Claim Construction brief: September 13, 2021

Defendant's Reply Claim Construction brief: September 27, 2021

Plaintiff's Sur-Reply Claim Construction brief: October 11, 2021

Joint Claim Construction Statement deadline: October 14, 2021

Technical Tutorial deadline: October 25, 2021

Additionally, the Parties have reached an agreement concerning the number of terms and page limits to govern *Markman* briefing across the above-captioned cases. The agreement reached by the parties is set forth as follows: one consolidated brief limited to 12 terms, 40 pages for opening and response briefs, and 15 pages for reply and sur-reply briefs.¹

Date: August 13, 2021

Respectfully submitted,

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¹ Canon reserves its rights to seek consolidation of the above-captioned cases on all issues.

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Date: August 13, 2021

Respectfully submitted,

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